



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue
Seattle, Washington 98101

February 6, 2002

Reply To
Attn Of:ECL-113

Commander, Ft. Lewis
Directorate of Public Works
ATTN: AFZH-DEQ MS 17 (Mr. Eric Waehling)
Building 2012, Room 323
Ft. Lewis, WA 98433-9500

(sent via e-mail and regular mail)

Subject: Reconnaissance Comments

Dear Mr. Waehling:

Overall, the field effort seems to have been successful. Please find EPA's comments regarding the field work which should assist with work plan modifications for future efforts. Please contact me at (206) 553-1220 or at sheldrake.sean@epa.gov with any questions or concerns.

Sincerely,

Sean Sheldrake, Project Manager

cc: Mike Nelson, USACE
Christopher Maurer, WDOE

(Via email only)
“”

Memorandum

Date: December 17, 2001

To: N. Lantzer, GF

Fr: R. Peek, GF

cc: Harry Craig, EPA
David Croxton, EPA

Subj: Camp Bonneville Final Oversight Report for December 17, 2002

While the team was able to operate in all areas of Camp Bonneville, several items of concern have posed problems for future work. Vegetation and terrain posed the greatest risk to completion of reconnaissance operations. Even though the team was able to operate, the vegetation and terrain limited the team to closer line spacing than required by the work plan. It also increased the time needed to complete operations. This problem when compiled with satellite coverage problems, needs to be address for future work at Camp Bonneville. Every day that the team conducted operations, there were several times that the team lost satellite coverage. This loss of signal lasted any where from 10 minutes to over an hour and a half.

Overall, I believe that the reconnaissance efforts were successful. Listed below are several areas of concern that need to be reviewed for Work Plan, SOP, SSHS and EE/CA compliance.

1. Project Manager

IAW - *Final Reconnaissance Work Plan for Additional Site Characterization at Camp Bonneville dtd October 2001*, Page 4-2, Paragraph 4.2.4.2.

The Parsons Project Manager (PM) is responsible for communicating with USACE all aspects of the project, including overseeing the overall performance of all individuals on the project team, and resolving problems. The PM is also responsible for controlling the contractual cost and schedule targets. The PM will coordinate the implementation of reconnaissance activities, GIS activities and data management effort, and coordinate the preparation of the report.

There is no PM on site to oversee the overall performance of all individuals on the project team.

2. Site Manager

IAW - *Final Reconnaissance Work Plan for Additional Site Characterization at Camp Bonneville dtd October 2001*, Page 4-2, Paragraph 4.2.4.3.

The Parsons Site Manager (SM) will manage all field investigation activities under the direction of the Parsons PM. Specific responsibilities include scheduling daily safety meetings, scheduling and coordinating field team activities, and submitting a Daily Activities Report to the Parsons PM. The SM will be responsible for direct oversight of activities during the field investigation and will review the weekly status reports. The SM will coordinate with the PM as necessary to take corrective actions to assure that budgets and schedules are enforced during the field investigation. Site Manager duties will also include ensuring compliance with the SSHP and general daily field operating procedures. The SM will report all QC failures and corrective actions to the Parsons PM and QC Manager.

Parsons did have a Site Manager on site, but I do not believe that he was able to carry out his assigned task as Site Manager, i.e... "The SM will be responsible for direct oversight of activities during the field investigation..." do to the fact that he was also part of the field team conducting reconnaissance operations.

3. QC Manager

IAW - Final Reconnaissance Work Plan for Additional Site Characterization at Camp Bonneville dtd October 2001, Page 4-2, Paragraph 4.2.4.4.

The QC Manager is independent of the project implementation team and is responsible for reviewing all QC procedures to be used in the project, including reviewing subcontractor system audits and QC procedures to ensure compliance with the project QC guidelines in the WP, performing a quality review to ensure the quality of deliverables from the project team to USACE, and interacting and communicating with subcontractor and USACE QA personnel.

There was no QC Manager on site to review all QC procedures to be used in the project nor to ensure compliance with the project QC guidelines in the WP. With out an independent QC Manager on site to manage/verify/control on-site QC procedures, all findings collected during this project are questionable.

This Item of Interest also effects all of the following items. If Parsons had a QC Manager on site, most of the following problems should have be corrected prior to over-sight personal visits.

4. SSHO/UXO Tech III-II/UXO Escort

Parsons had one UXO Tech "triple hatted" in these positions, which poses a safety hazard of significance. The SSHO, which is responsible for the safety of all field personal and accident reporting, was also part of the reconnaissance field team.

5. Items of Interest

All team members should be marking all items of interest. During the reconnaissance operations, the team failed to mark and take way points on all items of interest...e.g., fired tail fin assembly form a 3.5 in rocket, nose cone off a practice 3.5 in Rocket.

This situation occurred on 15 Nov., on my first day observing field operations. This Item of Interest was corrected the following day, but the team had been operating in this manor for over a week prior to my arrival, which brings up several questions on the reliability of the information logged prior to my arrival. This also reflects the need for onsite QC/QA by Parsons.

IAW - Final Reconnaissance Work Plan for Additional Site Characterization at Camp Bonneville dtd October 2001, Page 2.4 Paragraph 2.4.

INSTRUMENT ASSISTED RECONNAISSANCE

The objective of the instrument-assisted reconnaissance is to confirm and evaluate the existence, location, and UXO/OE characteristics of the AOCs and AOPCs. Additionally, information will be collected to identify specific terrain and vegetation characteristics within AOCs and AOPCs. These data sets will ultimately be used to refine the proposed geophysical investigation and intrusive sampling at Camp Bonneville. **This objective will be achieved by locating and recording information relative to selected AOCs and AOPCs including identifying targets, fragmentation, OE items,** etc. This section details the

reconnaissance activities including procedures, investigation areas, quality control, and data management.

6. Line spacing

(The following comment is made with understanding that terrain and vegetation does pose significant obstacles in maintaining line spacing during reconnaissance efforts.)

Within minutes of beginning the reconnaissance the team lost sight of each other and had to use whistles and radios to maintain contact with one another. With terrain and vegetation in mind, it is understandable that a team member may lose sight of the team member next to them for a few minutes, but losing sight of the other team members for the entire sweep poses a safety hazard of significant importance.

This situation occurred on 15 Nov., on my first day observing field operations. This “Item of Interest” was corrected the following day, but the team had been operating in this manor for over a week prior to my arrival, which brings up several questions on the reliability of the information logged prior to my arrival. This also reflects the need for onsite QC/QA by Parsons.

IAW - Final Reconnaissance Work Plan for Additional Site Characterization at Camp Bonneville dtd October 2001, Page 2-5 Paragraph 2.4.1.2.

When performing a survey, the **team members will be spaced at such a distance that they are able to maintain visual contact with the nearest team member.** This spacing distance shall be no greater than the distance presented in Tables 2.5-1 through 2.5-5. The reconnaissance spacing distance is based on the weapons system used for suspect area or the anticipated historical use of the area.

7. Transect Azimuth

At this time I do not have the azimuth that the team use to transect the impact area. This “Item of Interest” needs to be reviewed when we receive all documentation from Parsons.

8. Regulators

It is apparent that all regulators are not treated the same by the USACE Project manager for this operation. This “Item of Interest” does pose a problem for over-sight personal. During field operation Mike Nelson (USACE Project Manager) limited the EPA UXO qualified over-sight personal from freely conducting over-sight of the field reconnaissance operations. I was limited to reviewing the operations from the side of Parsons UXO Escort, which would not have been a hindrance if the Escort was not part of the reconnaissance team. I was only able to comment on areas visible from one member of the sweep team.

V/R
Ray Peek